

Message

From: Surovchak, Scott [Scott.Surovchak@lm.doe.gov]
Sent: 3/8/2017 8:38:36 PM
To: Smith, Patricia [Smith.Patricia@epa.gov]; Gallo, Patty (CONTR) [Patty.Gallo@lm.doe.gov]
CC: Kaiser, Linda (CONTR) [Linda.Kaiser@lm.doe.gov]; Ward, David (CONTR) [David.Ward@lm.doe.gov]; 'Carl Spreng (carl.spreng@state.co.us)' (carl.spreng@state.co.us) [carl.spreng@state.co.us]; Murl, Jeffrey [Jeffrey.Murl@lm.doe.gov]; Moritz, Vera [Moritz.Vera@epa.gov]; lindsay.masters@state.co.us
Subject: RE: Protectiveness statement for Rocky Flats FYR
Attachments: removed.txt

Everybody is correct here! The CAD/ROD utilized all the information collected in the RI and evaluated in the FS and CRA, including the results of the interim actions (Building D&D, landfill covering/capping, GW treatment system installation, soil removal, off-site waste disposal, and various other interim actions) to arrive at the final remedy of ICs, Physical Controls (which includes the IM/IRAs under RFCA during site closure) and monitoring of both. Essentially, the IM/IRAs completed during closure left the site within the CERCLA risk range and all that was left to do was document and put in place the controls and monitor to "ensure that both human health and the environment will be adequately protected."

So how do we say that to everybody's satisfaction?

From: Smith, Patricia [mailto:Smith.Patricia@epa.gov]
Sent: Wednesday, March 08, 2017 12:27 PM
To: Gallo, Patty (CONTR)
Cc: Kaiser, Linda (CONTR); Ward, David (CONTR); 'Carl Spreng (carl.spreng@state.co.us)' (carl.spreng@state.co.us); Surovchak, Scott; Murl, Jeffrey; Moritz, Vera; lindsay.masters@state.co.us; Smith, Patricia
Subject: RE: Protectiveness statement for Rocky Flats FYR

Where's Vera to give me a reality check when I need one? Here's my thinking:

One, it's my understanding that the CAD/ROD adopted these interim remedies already in place, and agreed to maintain them. If not, the president made a remedial decision in the IM/IRAs and they would be subject to separate review. Let's not go there. Perhaps adding "in early actions" to the end of the 2nd sentence would help.

Two, don't you think leaving that information out looks like a real gap? How would the public view such fundamental missing pieces?

Three, haz waste project management generally follows the following logic: source control, pathway control (GW, SW, etc.), ICs for things that the engineered part of the remedy didn't cover. The ICs come last because they are fill gaps in the rest of the remedy.

Pat Smith, RPM
EPA Region 8
303-312-6504

From: Gallo, Patty (CONTR) [mailto:Patty.Gallo@lm.doe.gov]
Sent: Wednesday, March 08, 2017 11:20 AM
To: Smith, Patricia <Smith.Patricia@epa.gov>
Cc: Kaiser, Linda (CONTR) <Linda.Kaiser@lm.doe.gov>; Ward, David (CONTR) <David.Ward@lm.doe.gov>; 'Carl Spreng (carl.spreng@state.co.us)' (carl.spreng@state.co.us) <carl.spreng@state.co.us>; Surovchak, Scott <Scott.Surovchak@lm.doe.gov>; Murl, Jeffrey <Jeffrey.Murl@lm.doe.gov>; Moritz, Vera <Moritz.Vera@epa.gov>; lindsay.masters@state.co.us
Subject: RE: Protectiveness statement for Rocky Flats FYR

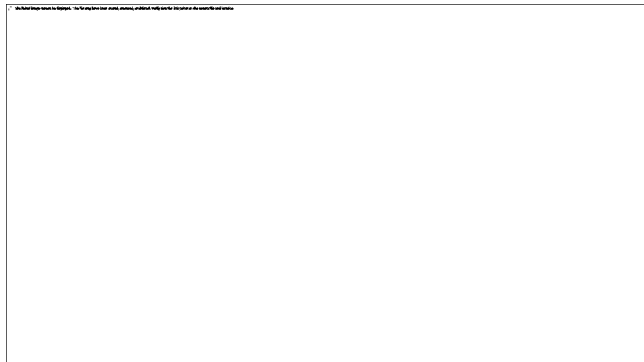
Pat,

I wanted to follow up with you regarding your suggestion of leading with source controls and not ICs. The Rocky Flats CAD/ROD names the selected remedy for the COU as "...institutional and physical controls, incorporating continued monitoring and maintenance." This is why, as you pointed out in the meeting last week, the FYR report leads with ICs. It is my understanding that the source controls at the site (landfill covers, groundwater treatment systems) were put into place as part of 'interim measures/interim removal actions' during cleanup. The second sentence in the protectiveness statement you provided "Contaminated soils, sediments, equipment and buildings have been removed, and landfills and residual contamination have been capped" are all interim actions that were completed prior to the final remedy being selected in the 2006 CAD/ROD. So I guess I am struggling a bit with how the interim actions fit into a protectiveness statement for the final remedy – what are your thoughts?

P.S. At a minimum, I will ensure that the information in your statement regarding the interim actions (Contaminated soil, sediments...) is captured in the Background section of the FYR report and the Site Chronology for completeness.

Patty

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From: Smith, Patricia [<mailto:Smith.Patricia@epa.gov>]
Sent: Tuesday, March 07, 2017 11:22 AM
To: Gallo, Patty (CONTR); 'Carl Spreng (carl.spreng@state.co.us)' (carl.spreng@state.co.us); lindsay.masters@state.co.us; Murl, Jeffrey; Moritz, Vera; Surovchak, Scott
Cc: Kaiser, Linda (CONTR); Ward, David (CONTR); Smith, Patricia
Subject: RE: Protectiveness statement for Rocky Flats FYR

My recommendation for revising the text below is attached. It is more specific about your remedial actions, and you'll see a slightly stronger connection to objectives in the RAO summary table. I recommend leading with source controls, not ICs.

Pat Smith, RPM
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From: Gallo, Patty (CONTR) [mailto:Patty.Gallo@lm.doe.gov]
Sent: Monday, March 06, 2017 11:23 AM
To: 'Carl Spreng (carl.spreng@state.co.us)' (carl.spreng@state.co.us) <carl.spreng@state.co.us>; lindsay.masters@state.co.us; Murl, Jeffrey <Jeffrey.Murl@lm.doe.gov>; Moritz, Vera <Moritz.Vera@epa.gov>; Surovchak, Scott <Scott.Surovchak@lm.doe.gov>; Smith, Patricia <Smith.Patricia@epa.gov>
Cc: Kaiser, Linda (CONTR) <Linda.Kaiser@lm.doe.gov>; Ward, David (CONTR) <David.Ward@lm.doe.gov>
Subject: Protectiveness statement for Rocky Flats FYR

All:

As a result of discussions in the last FYR Team meeting, I revised the protectiveness statement (below). Feel free to make any changes or add comments directly in this email and send back to me no later than this Wednesday, March 8, if possible.

I've also attached Appendix F, *Documents Reviewed*, which is a simple list of documents reviewed for this FYR. I used the 2001 EPA guidance document to decide which documents should be included in the list. Feel free to comment on this Appendix as well.

The remedy at the COU is protective of human health and the environment. Institutional controls are in place and effective in preventing unacceptable exposures by prohibiting building construction, controlling intrusive activities, restricting use of groundwater and surface water, and protecting engineered remedy components. Physical controls are in place and effective at controlling site access. Surface and groundwater monitoring provides assurance that water quality at the COU boundary is protective. Routine inspections of engineered remedy components ensure that remedy maintenance and repairs are identified and implemented in a timely manner. Groundwater treatment systems continue to reduce contaminant load to surface water. Optimization of groundwater treatment systems is occurring to further reduce contaminant concentrations entering surface water.

In accordance with EPA guidance, because Rocky Flats is a construction complete site, a site-wide protectiveness statement is also required in the FYR report. Because the remedial actions at all OUs associated with the Rocky Flats site (COU, POU, and OU3) are protective, the site is protective of human health and the environment. The remedy in place at the COU is protective and the POU and OU3 continue to meet the conditions for UU/UE.

P.S. I will be forwarding the revised Question B section and Appendix C, Risk Review (with tracked changes) for your review either later today or tomorrow.



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